

ATTACHMENT 1

COMPLAINT FORM

(for non-prisoner filers without lawyers)

IN THE UNITED STATES DISTRICT COURT

FOR THE Western DISTRICT OF Wisconsin

Robert W. Kastenmeier U. S. Courthouse, 120 Henry St., Room 320, Madison WI 53703

(Full name of plaintiff(s))

Jerry E Butler

vs

Case Number: **20 CV 175 WMC**

(Full name of defendant(s))

(to be supplied by clerk of court)

Jim Eschalante, Associate Dean, School of Education

Barb Gerloff, Assistant Dean, School of Education

Gail Simpson, Professor, Art Department, School of Education

Doug Rosenberg, Chair, Art Department, School of Education

Teri Englke, Assistant Dean, School of Education

Beth Janetski, Policy and Planning Analyst, School of Education

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

705 N Midvale Blvd. Madison, Wisconsin 53705

(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Jim Eschalante, Barb Gerloff, Gail Simpson, Doug Rosenberg
Teri Englke, Beth Janetski (Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at Unknown
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for University of Wisconsin Madison, Art Department School of Education
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

In 2014 Jim Eschalante, Associate Dean, School of Education, Barb Gerloff, Assistant Dean, School of Education, Gail Simpson, Professor, Art Department, School of Education, Doug Rosenberg, Chair, Art Department, School of Education, Teri Englke, Assistant Dean, School of Education, Beth Janetski, Policy and Planning Analyst, School of Education engaged their institutional and personal bias to block my most qualified access to PVL 79381 Faculty Associate – Art Education position.

Each individual (listed above) charged with the non-bias (race, age, gender, etc.) engagement in hiring at the University of Wisconsin Madison for this position failed to critically review my complete application. The entire process therefore employed an unbalanced approach of power and privilege to dismiss my application materials because of my age and or race. The facts show that there is no lawful explanation for the actions of the committee, the department and the School of Education in denying my access to this position.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

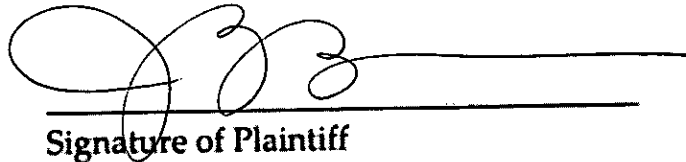
~~I am seeking payment for the past 6 years at the level of Associate Professor—70K per year plus benefits. I am well qualified for the Drawing and Painting Position posted online and in the newsletter for the Art Department at the University of Wisconsin-Madison. I seek to be placed in this position for the next five years at the associate professor level (75k per year).~~

E. JURY DEMAND

- ☒ Jury Demand - I want a jury to hear my case
OR
☐ Court Trial - I want a judge to hear my case

Dated this 25th day of February 20 20

Respectfully Submitted,


Signature of Plaintiff

608-658-1870

Plaintiff's Telephone Number

j4butler@gmail.com

Plaintiff's Email Address

705 N Midvale Blvd., Madison, Wisconsin 53705

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

- ☐ I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.
- ☒ I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.